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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
WILFREDO TORRES,

Plaintiff,

16CV3437

-against-

ANSWER

NEW YORK CITY POLICE DEPARTMENT and  
BELLEVUE SOUTH ASSOCIATES, L.P.,

Defendants.  
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Defendant Bellevue South Associates, L.P. ("BSA"), by its undersigned attorney, as and for its Answer to the Complaint, alleges as follows:

1. Denies the allegation in Paragraph 1 that defendant BSA assisted the New York City Police Department on September 28, 2015 in raiding plaintiff's apartment and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 1.

2. Respectfully refers the court to the document identified in Paragraph 2 of the Complaint for its contents.

3. Denies the allegation in Paragraph 3 that defendant BSA assisted the New York City Police Department on April 28, 2016 in raiding plaintiff's apartment and otherwise denies

knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 3.

4. Denies the allegations of Paragraph 4.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

5. The Complaint fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

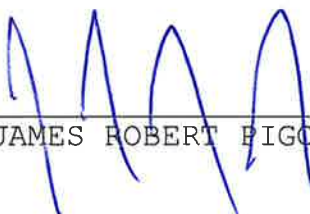
6. Defendant BSA is not a state actor.

THIRD AFFIRMATIVE DEFENSE

7. Defendant BSA is not responsible for the actions of defendant New York City Police Department.

WHEREFORE, defendant BSA respectfully requests that the Court dismiss this action and grant such other and further relief as to this Court seems fair and equitable.

Dated: New York, New York  
August 29, 2016



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